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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ALPS PROPERTY & CASUALTY )  
INSURANCE COMPANY )  
 )  
Plaintiff, )  
 )  
v. )  
KALICKI COLLIER, LLP; JOHN A. )  
COLLIER; JAMES A KALICKI; and ROBIN )  
RUMBAUGH, as Trustee of the Edith and )  
James Harley Trust Dated August 31, 1981, )  
Trustee of the Edith and James Harley Trust - )  
Survivor's Trust, and Trustee of the Edith and )  
James Harley Trust - Residual Trust. )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case No.: 3:19-cv-00709-MMD-CLB

**STIPULATION FOR EXTENSION OF  
TIME FOR THE KC DEFENDANTS TO  
RESPOND TO PLAINTIFF ALPS  
PROPERTY & CASUALTY  
INSURANCE COMPANY'S MOTION  
FOR SUMMARY JUDGMENT AND  
FOR ALPS TO FILE ITS REPLIES  
(THIRD REQUEST)**

Plaintiff ALPS Property & Casualty Insurance Company ("ALPS") and Defendants  
Kalicki Collier LLP ("Kalicki Collier Firm"), John A. Collier ("Collier"), and James A. Kalicki  
("Kalicki" and together with Collier and the Kalicki Collier Firm, "KC Defendants"), by and  
through their respective counsel, respectively stipulate that the KC Defendants shall have up to  
and including **Tuesday, August 11, 2020**, to respond to the ALPS' motion for summary  
judgment.

The parties further stipulate that ALPS shall have up to and including **Friday, August 28,**  
**2020**, to file its reply to the KC Defendants' opposition. All the parties, including Defendant  
Robin Rumbaugh ("Rumbaugh"), in her capacity as Trustee of the Edith and Jame Harley Trust  
Dated August 3, 1981, the Edith and James Harley Trust - Survivor's Trust, and the Edith and  
James Harley Trust - Residual Trust, previously stipulated that ALPS shall have up to and  
including Friday, August 28, 2020, to file its replies. (ECF #81).

On Friday, June 26, 2020, ALPS filed a motion for summary judgment (ECF #77). The responses were originally due on July 17, 2020.

On Thursday, July 2, 2020, the KC Defendants requested a two week extension of time to file a response to the motion for summary judgment and ALPS graciously granted the request. The parties filed a stipulation for an extension of time. (ECF #78).

On July 27, 2020, the KC Defendants requested an additional one week extension of time to file a response and ALPS graciously granted the request. The parties filed a stipulation for an extension of time. (ECF #81).

On August 5, 2020, Rumbaugh filed an opposition to the motion for summary judgment. (ECF #83).

On August 5, 2020, the KC Defendants requested an additional two business days to file a response and ALPS graciously granted the request. This is the third (3rd) requested extension.

DATED this 6<sup>th</sup> day of August, 2020.

DATED this 6<sup>th</sup> day of August, 2020.

KUTAK ROCK LLP

LEVERTY & ASSOCIATES LAW CHTD.

/S/ Brooke McCarthy

/S/ Patrick Leverty

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**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: August 6, 2020.

**CERTIFICATE OF SERVICE**

I, HEREBY CERTIFY that, on August 6, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/S/ Patrick Leverty  
Patrick R. Leverty